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August 23, 2022

Via ECF and Electronic Mail

Honorable John P. Cronan

United States District Judge

Southern District of New York

500 Pearl Street

New York, NY 10007

CronanNYSDChambers@nysd.uscourts.gov

Re: Allah-El, et al. v. Acacia Network, Inc., et al.
Index No.: 20-cv-08199-JPC

Dear Judge Cronan:

We represent the Plaintiffs in the above-referenced matter. We write Your Honor, with the consent of the Defendants, to request a 30-day stay of discovery. Presently, fact discovery is scheduled to end on September 13, 2022.

This is the Parties' first request for a stay of discovery. As Your Honor is aware, the Parties have recently rekindled settlement discussions. However, during the pendency of such discussions, Plaintiff Valentine Perez suffered a medical emergency which has temporarily incapacitated him and rendered him unable to effectively engage in the litigation/discussions. Plaintiffs believe that this 30-day stay will allow Plaintiff Perez to recover and reengage fully in this matter.

We appreciate Your Honor's attention to this matter.

Respectfully Submitted,

Phillips & Associates, PLLC

/s/Gregory W. Kirschenbaum

Gregory W. Kirschenbaum, Esq.

cc: Simi Bhutani, Esq., *Attorneys for the Corporate Defendants* (Via ECF)

cc: Kaitlyn P. Long, Esq. *Attorneys for the Individual Defendant* (via ECF)

The Court will extend the deadlines for completion of discovery by 30 days. The new deadline for the completion of fact discovery is October 13, 2022, and the new deadline for the completion of expert discovery is November 28, 2022. The parties may request a referral to the assigned magistrate judge for a settlement conference or to the Court's mediation program by letter.

SO ORDERED

Date: August 25, 2022

New York, New York



JOHN P. CRONAN

United States District Judge